



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street, 3rd Floor
New York, New York 10007

March 18, 2013

By E-Mail (crottynysdchambers@nysd.uscourts.gov)

The Honorable Paul A. Crotty
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

USDC SDNY
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DATE FILED: 3-18-13

Re: *Residents for Sane Trash Solutions, Inc. et al. v.*
United States Army Corps of Engineers et al.,
12 Civ. 8456 (PAC)

Kellner et al. v. United States Army Corps of
Engineers et al., 12 Civ. 8458 (PAC)

Dear Judge Crotty:

This Office represents defendants the United States Army Corps of Engineers and Colonel Paul E. Owen (collectively, "USACE") in the above-referenced, related matters.

✓ We write respectfully to request a 30-day extension of time to answer or otherwise respond to the amended complaints in these matters, from March 19, 2013 until April 18, 2013, in order to allow additional time to prepare responses to plaintiffs' new allegations. This is USACE's second request for an extension; the Court previously granted USACE's request for a one-week extension of time to answer the initial complaints. (See *Sane Trash Solutions*, Dkt. No. 9). Additionally, in the interest of maintaining a coordinated schedule, defendants the City of New York, the City of New York Department of Sanitation, and the City of New York Department of Design and Construction (collectively, the "City") join in this extension request. Plaintiffs in both matters consent to an extension.

MEMO ENDORSED

SO ORDERED:

Paul A. Crotty
HON. PAUL A. CROTTY
UNITED STATES DISTRICT JUDGE

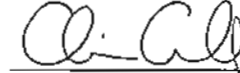
3-18-13

We thank the Court for its consideration of this letter.

Respectfully,

PREET BHARARA
United States Attorney for the
Southern District of New York

By:



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